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1 UNITED STATES BANKRUPTCY COURT

2 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

3 In re  
4 The Roman Catholic Archbishop of San  
5 Francisco,  
6 Debtor and  
7 Debtor in Possession.

8 The Roman Catholic Archbishop of San  
9 Francisco,

10 Plaintiff,

11 v.

12 John DB Roe SF, John Doe H.M, C.M.,  
13 John Doe SF 1218, Jane Doe SF 2017, John  
14 Roe 521, John Roe 663, John Doe 664, LL  
15 John Doe WC, John Doe SF 2028, John  
16 Doe SF 1510, John Doe, John Roe 644,  
17 Jane Roe, G.J., M.R.H., John Doe SF 1426,  
18 John Doe L.M., John Doe 457, John Doe

19 Case No. 23-30564  
20 Chapter 11  
21 Adv No. 25-03019  
22  
23  
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**NOTICE OF HEARING ON MOTION FOR  
ORDER EXTENDING STAY TO ALL  
STATE COURT CASES IN WHICH  
DEBTOR AND/OR NON-DEBTOR  
AFFILIATES ARE NAMED AS  
DEFENDANTS UNDER BANKRUPTCY  
CODE SECTIONS 105(a) AND 362**

Judge: Hon. Dennis Montali  
Date: June 26, 2025  
Time: 1:30 p.m.  
Place: Zoom.Gov

1 A.D.R., John Doe A.L.R., John Roe 417,  
2 John Roe 499, G.W., Joseph Doe OAK 475,  
3 John Doe MR 1236, Jane Doe 7, John PV  
Roe 554, John Doe F.O., John Doe  
CLG03522, John Doe SF 1913, Jane Doe  
SF 1260, John Doe SF 1026, John Doe SF  
1196, Jane Doe SF 1200, John Doe SF  
1201, Jane Doe SF 1233, Joseph Doe SF  
601, and Jane Doe 116,  
Defendants,

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8                   **TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**  
9 **JUDGE, THE UNITED STATES TRUSTEE, AND ALL DEFENDANTS:**

10                  **PLEASE TAKE NOTICE** that on May 29, 2025, The Roman Catholic Archbishop of San  
11 Francisco, the debtor and debtor in possession in the above-captioned chapter 11 case and plaintiff  
12 in the above-captioned adversary proceeding (the “Debtor”), filed its *Motion for Order Extending  
13 Stay to All State Court Cases in Which Debtor and Non-Debtor Affiliates Are Named as  
14 Defendants Under Bankruptcy Code Sections 105(a) and 362* (the “Motion”), *Memorandum of  
15 Points and Authorities in Support of Motion for Order Extending Stay to All State Court Cases in  
16 Which Debtor and/or Non-Debtor Affiliates Are Named as Defendants Under Bankruptcy Code  
17 Sections 105(a) and 362* (the “Memorandum of Points and Authorities”),<sup>1</sup> and supporting  
18 declarations of Paul E. Gaspari (the “Gaspari Declaration”) and Barron L. Weinstein (the  
19 “Weinstein Declaration”).

20                  **PLEASE TAKE FURTHER NOTICE** that a hearing to consider the Motion (the  
21 “Hearing”) will be conducted via videoconference has been scheduled for **June 26, 2025, at 1:30**  
22 **p.m.** before the Honorable Dennis Montali, United States Bankruptcy Judge.

23                  **PLEASE TAKE FURTHER NOTICE** that by the Motion, the Debtor seeks entry of one  
24 or more orders for declaratory and injunctive relief as follows:

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<sup>1</sup> Capitalized terms not otherwise defined in this notice shall have the same meanings ascribed to  
28 them in the Motion and Memorandum of Points and Authorities.

1        1. A declaration that the automatic stay under Bankruptcy Code Section 362(a)<sup>2</sup>  
2 applies to all State Court Actions in which the Debtor is named as a co-defendant along with Non-  
3 Debtor Affiliates;

4        2. A declaration that the automatic stay under Section 362(a) applies to all State Court  
5 Actions in which Non-Debtor Affiliates are named as defendants because such actions would  
6 implicate property of the estate;

7        3. A declaration that any acts to continue prosecution, discovery, or trial preparation  
8 in these State Court Actions violate the automatic stay and are void;

9        4. A declaration that the automatic stay extends to any future State Court Actions that  
10 plaintiffs may seek to actively litigate against the Debtor and/or Non-Debtor Affiliates during the  
11 pendency of this Case; and

12        5. In addition, and in the alternative, an injunction pursuant to Bankruptcy Code  
13 Section 105(a) barring the prosecution of each of the State Court Actions which names any of the  
14 Non-Debtor Affiliates as a defendant and the Debtor as a co-defendant during the pendency of this  
15 Case, or until further order of this Court.

16        **PLEASE TAKE FURTHER NOTICE** that the Motion is based on the Memorandum of  
17 Points and Authorities, the previously filed Declaration of Joseph J. Passarello in Support of  
18 Chapter 11 Petition and First Day Motions (the “Passarello Decl.”) [ECF No. 14], the previously  
19 filed Declaration of Paul E. Gaspari in Support of Chapter 11 Petition and First Day Motions  
[ECF No. 15], the concurrently filed Gaspari and Weinstein Declarations, the supporting exhibits  
21 for each, all pleadings, papers, and records on file with the Court, and such other evidence, both  
22 oral and documentary, as may be presented to the Court at or before the time of the Hearing.

23        **NOTICE IS FURTHER GIVEN** that the Hearing will be conducted only via Zoom. The  
24 court’s website offers information explaining how to arrange an appearance at a video hearing. If  
25 you have questions about how to participate in a video hearing, you may contact the court by  
26 calling 888-821-7606 or by using the Live Chat feature on the court’s website. The Bankruptcy

27        <sup>2</sup> All section references in this notice are to title 11 of the United States Code (the “Bankruptcy  
28 Code”).

1 Court's website provides information regarding how to arrange an appearance at a video or  
2 telephonic hearing. If you have questions about how to participate in a video or telephonic  
3 hearing, you may contact the court by calling 888-821-7606 or by using the Live Chat feature on  
4 the Bankruptcy Court's website. The link to the judge's electronic calendar is:  
5 <https://www.canb.uscourts.gov/judge/montali/calendar>.

6       **NOTICE IS FURTHER GIVEN** that on or before **June 12, 2025**, any opposition or  
7 response to the Motion must be in writing, filed with the Bankruptcy Court, and served on the  
8 counsel for the Debtor and its bankruptcy counsel as listed on the upper left-hand corner of the  
9 first page of this notice, and any other party that has requested notice in the above-captioned  
10 adversary proceeding. Failure to timely file opposition and appear at the Hearing may constitute a  
11 waiver of your objections. Your rights may be affected. You should read these papers carefully  
12 and discuss them with your attorney, if you have one in this Bankruptcy Case. If you do not have  
13 an attorney, you may wish to consult one.

15 | Dated: May 29, 2025

FELDERSTEIN FITZGERALD WILLOUGHBY  
PASCUZZI & RIOS LLP

By

/s/ *Paul J. Pascuzzi*

PAUL J. PASCUZZI  
JASON E. RIOS  
THOMAS R. PHINNEY

Attorneys for The Roman Catholic Archbishop of  
San Francisco

Dated: May 29, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By

/s/ *Ori Katz*

ORI KATZ

AMANDA L. COTTRELL

Attorneys for The Roman Catholic Archbishop of San  
Francisco